

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

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(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

RETENTION QUESTIONNAIRE

**RETENTION QUESTIONNAIRE TO BE COMPLETED BY EACH ORDINARY
COURSE PROFESSIONAL EMPLOYED BY THE DEBTOR**

Do not file this Questionnaire with the Court. Please return it to:

Jones Day

Attn: Dan B. Prieto, Esq.

Amanda Rush, Esq.

2727 North Harwood Street, Suite 500, Dallas, Texas 75201

dbprieto@jonesday.com

asrush@jonesday.com

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

and

Jones Day
Attn: Isel M. Perez
600 Brickell Avenue, Suite 3300, Miami, Florida 33131
iperez@jonesday.com

If more space is needed, please complete on a separate page and attach.

1. Name and Address of Firm:

Nelson Mullins Riley & Scarborough LLP
Meridian 17th Floor
1320 Main Street
Columbia, SC 29201

2. Date of retention:

October 14, 2021

3. Type of services to be provided:

Litigation advice and services related to personal injury arising from the alleged use of talc-containing products manufactured, distributed, marketed, and/or sold for which the Debtor is responsible.

The Firm appears on behalf of the Debtor in the following court:
United States District Court for the District of South Carolina
Court of Common Pleas, Ninth Judicial Circuit, Charleston County, South Carolina

4. Brief description of services to be provided:

Monitoring case dockets and assisting with matters related to enforcing the automatic stay and, to the extent necessary and permitted by order of this Court, services would also include preparing for hearings, oral arguments, trials and other court proceedings as may be required, and providing other litigation related services, including preparing required court filings, as the Debtor may require.

5. Arrangements for compensation (hourly, contingent, etc.) Hourly

(a) Average hourly rate (if applicable):

Partner: \$530
Sr. Associate: \$308
Paralegal: \$180

(b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition): \$3,000

6. Prepetition claims against the Debtor held by the firm:

\$15,242.20²

7. Prepetition claims against the Debtor held individually by any member, associate, or professional employee of the company:

None.

8. Disclose the nature and provide a brief description of any interest adverse to the Debtor or to its estates for the matters on which the firm is to be employed:

The Firm does not have an interest adverse to the Debtor. The Firm does jointly represent Johnson & Johnson in certain personal injury actions arising from the alleged use of talc-containing product.

9. Name and title of individual completing this form:

Amanda Kitts, Partner

Dated: June 3, 2022

² As of the Petition Date, \$15,242.20 was owed for work performed on behalf of Johnson & Johnson and the Debtor's predecessor, Johnson & Johnson Consumer, Inc., with respect to claims asserted against Johnson & Johnson and Johnson & Johnson Consumer, Inc. and now the Debtor, arising from the alleged use of certain talc-containing products. The Firm has billed this amount to Johnson & Johnson, consistent with the terms of its engagement with Johnson & Johnson.